

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TEXTRON INNOVATIONS INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 05-486 (GMS)
	)	
THE TORO COMPANY,	)	
	)	
Defendant.	)	

**DECLARATION OF GLEN F. LENTNER**

OF COUNSEL:

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*Attorneys for Defendant  
The Toro Company*

Dated: August 16, 2005

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

_____	)	
TEXTRON INNOVATIONS, INC.,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO. 05-486 (GMS)
	)	
v.	)	
	)	
THE TORO COMPANY,	)	
	)	
Defendant.	)	
_____	)	

**DECLARATION OF GLEN F. LENTNER**

I, Glen F. Lentner, declare as follows:

1. I currently live at 16549 Baywood Lane, Eden Prairie, Minnesota 55346.
2. I am an employee of Inver Wood Golf Course ("Inver Wood") located at 1850 70th St. E., Inver Grove Heights, Minnesota 55077. I am 55 years of age.
3. I am the Superintendent of Inver Wood, and have held that position for over 14 years. I have worked in the golf-course industry for 38 years. I have a degree in horticulture from the University of Minnesota, Crookston. I am certified as a golf course superintendent by the Golf Course Superintendents Association of America ("GCSAA").
4. As superintendent of Inver Wood, my responsibilities include course maintenance, equipment purchasing, equipment maintenance, and staff supervision.
5. Through my 38 years working in the golf-course industry, I have educated and updated myself regarding various equipment and methods used to maintain golf courses. I have attended tradeshowes related to turf-care and turf-care products, evaluated many turf-care

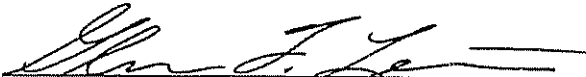
products, and purchased such products. I am quite familiar with many turf-care products used to mow golf course roughs, including products made by Toro, Jacobsen and others.

6. It is my understanding that Toro is currently involved in a patent lawsuit with Textron Innovations, Inc. related to commercial turf mowers. I also understand that one of the issues in this suit may be whether gang-type rotary mowers were used to cut golf course roughs February 3, 1996. Based on my extensive knowledge of the industry, gang-type rotary mowers were used extensively to cut golf course roughs at least as early as July of 1991. I also believe that the industry has been familiar with the use of gang-type rotary mowers to cut golf course roughs for at least 14 years.
7. Given my extensive knowledge and industry experience, I would expect to have information regarding prior art to Textron's patents. For example, back in the late 1980s I saw an experimental gang-type rotary mower used on a Minnesota golf course and could testify about that prior art.
8. Toro has tested various turf-care equipment on our golf course. In particular, Toro has used our golf course to test prototypes of what became Toro's GroundMaster 3500-D. I have knowledge relating to the prototype tested and tests conducted.
9. I understand that because of my extensive factual knowledge regarding golf-course turf equipment, current and historical use of such equipment, and the testing of the Toro products at issue in this lawsuit, I may be asked to testify at trial.
10. It would be very inconvenient for me to travel to Delaware to testify in this matter. If Toro asked me to testify in Delaware, I believe I would decline.

11. Moreover, should this lawsuit transfer to Minnesota, Toro or Textron would be welcome to use our facilities to demonstrate the operation and performance of the products at issue in this lawsuit for the Court or jury. In my opinion, Inver Wood is a good location to demonstrate operation and performance of these products because of the variety of terrain and type of turf present on the course.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 15<sup>th</sup> day of August 2005.

  
Glen F. Lentner

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**CERTIFICATE OF SERVICE**

I, David E. Moore, hereby certify that on August 16, 2005, the attached document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

Edmond D. Johnson  
Peter B. Ladig  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
Wilmington, DE 19801

I hereby certify that on August 16, 2005, I have Federal Expressed the documents to the following non-registered participants:

Scott L. Robertson  
Christopher C. Campbell  
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Washington, DC 20006-1109

By: \_\_\_\_\_



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